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Before the
Federal Communications Commission
Washington, D.C. 20554

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AUG 9 2004

Federal Communications Commission
Bureau/Office

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Las Vegas and Pecos, New Mexico))

MB Docket No. 04-218
RM-10987

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AUG 11 2004

Federal Communications Commission
Office of the Secretary

To: Chief, Audio Division

COMMENTS OF PETITIONER

Meadows Media, LLC ("Meadows"), is the licensee of FM Station KLVF, Las Vegas, New Mexico. The original rule making petition in this proceeding was filed by KFUN/KLVF, Inc. Meadows acquired the license for Station KLVF on June 4, 2004, thus stepping into the shoes of the original petitioner. Meadows, by counsel, hereby submits its comments in response to the Notice of Proposed Rule Making, DA 04-1623 (Released June 10, 2004) in the above-styled proceeding.

1. Following amendment of the Table of Allotments to allot FM Channel 264C3 to Pecos, New Mexico, Meadows intends to file an application promptly to relocate the transmitter site of KLVF to the vicinity of Pecos. Upon a grant of the application, Meadows will initiate FM radio service to the community of Pecos at the earliest possible date.
2. In the Notice, the Commission requests information on the gain and loss areas of the proposed facility serving Pecos as compared to the coverage of the existing transmitting facility of KLVF located at Las Vegas. As set forth in the attached engineering statement of Don Davis, this change will promote the pub-

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lic interest through a dramatic increase in the area and population served by KLVF. Specifically, within the existing 60 dbu contour, the KLVF operation at Las Vegas covers an area of 1,311 square kilometers and a population of 19,031 persons. The proposed KLVF Pecos operation will cover an area of 4,923 square kilometers and a population of 87,174 within the proposed 60 dbu contour. The resulting increased coverage from the proposed Pecos operation of KLVF is 3,612 square kilometers and an additional population of 68,143 persons.

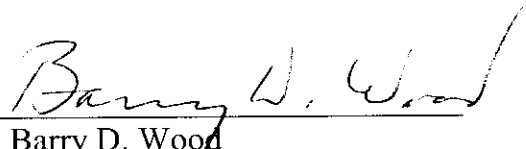
3. The Petition requests the allotment of FM Channel 296A to Las Vegas. When provided an opportunity to bid on this channel, Meadows will do so, and will promptly institute service to Las Vegas on the channel if it is the successful bidder.
4. The Commission's approval of the Petition will significantly increase the service to the public as described in paragraph 2 above, while Las Vegas will continue to be well served by both AM and FM stations as outlined in the original Petition. No "white" or "gray" coverage areas will be created by the implementation of this proposal.
5. The proposed KLVF Class C3 operation at Pecos will enable the licensee to increase its service to a significant area encompassing a largely rural population that relies on radio as a major means of communication as to local events and problems.

In view of the foregoing, Meadows respectfully submits that the proposed change of the allotment of FM Channel 264C3 from Las Vegas, New Mexico to Pecos, New Mexico would be a more efficient use of the FM broadcast spectrum and would be in the public interest.

Respectfully submitted,

MEADOWS MEDIA LLC

By:


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Its attorneys

Dated: August 9, 2004

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Washington, D.C. 20554**

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ENGINEERING STATEMENT OF DON DAVIS

Meadows Media, LLC ("Meadows"), the licensee of FM Station KLVF, Las Vegas, New Mexico, has directed the undersigned to prepare this Engineering Statement in support of its comments in response to the Notice of Proposed Rule Making, DA 04-1623 (released June 10, 2004) in the above-captioned proceeding.

The undersigned is a member of Meadows. He has prepared numerous applications and engineering statements filed with the FCC over the years. His qualifications are a matter of record with the Commission.

Having reviewed and researched the pertinent engineering facts, he hereby states as follows:

1. In the Notice, the Commission seeks information on the area to be gained or lost as the result of the proposed relocation to a site serving Pecos, as compared with the coverage of the existing transmitting facility of KLVF located at Las Vegas. This issue has been evaluated using the computer program known as RadioSoft, which has been accepted in other filings with the FCC previously.
2. The existing 60 dbu contour of KLVF, operating from Las Vegas encompasses an area of 1,311 square kilometers and a population of 19,031 persons. The proposed KLVF operation, using the proposed site near Pecos, will cover an area of 4,923 square kilometers and a population of 87,174 within the proposed 60 dbu contour. The resulting increased coverage from the proposed Pecos operation is 3,612 square kilometers. With this change, KLVF will be able to serve an additional population of 68,143 persons.
3. No "white" or "gray" coverage areas will be created by the implementation of this proposal. Las Vegas will retain other local transmission services, some of which already cover the current KLVF service area.

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In view of the foregoing, it is clear that the proposed change in the allotment of FM Channel 264C3 from Las Vegas, New Mexico to Pecos, New Mexico represents a more efficient use of the FM broadcast spectrum and would be in the public interest.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Meadows Media LLC

A handwritten signature in black ink, appearing to read "Don Davis". The signature is fluid and cursive, with the first name "Don" and last name "Davis" clearly distinguishable.

Don Davis

Managing Member